

**ENTERED**

January 27, 2025

Nathan Ochsner, Clerk

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re

Free Speech Systems, LLC,

Debtor,

Neil Heslin, et al,

Appellants.

Case No. 4:24-CV-03882

(Appeal in Bankr. Case No. 22-  
60043 (CML))

**AGREED ORDER EXTENDING  
BRIEFING DEADLINES**

Appellants Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and the Estate of Marcel Fontaine (collectively, the “Texas Plaintiffs”), Appellee, Christopher R. Murray in his capacity as chapter 7 trustee (“Trustee”) of the bankruptcy estate of Alexander E. Jones and sole owner of Free Speech Systems LLC, and the Connecticut Plaintiffs<sup>1</sup> (together, the Texas Plaintiffs, Trustee, and the Connecticut Plaintiffs are referred to herein as the “Parties”) hereby enter into this stipulation and agree as follows:

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<sup>1</sup> The Connecticut Plaintiffs are: William Aldenberg, Erica Ash, Jacqueline Barden, Mark Barden, Jennifer Hensel, Ian Hockley, Nicole Hockley, Robert Parker, William Sherlach, Carlos M. Soto, Donna Soto, Carlee Soto Parisi, Jillian Soto-Marino, David Wheeler, and Francine Wheeler.

**WHEREAS**, on October 8, 2024, the Texas Plaintiffs filed their Notice of Appeal in *In re Free Speech Systems, LLC*, Case No. 22-60043 in the Bankruptcy Court for the Southern District of Texas (the “FSS Case”) (FSS Case, Dkt. 1028). The Texas Plaintiffs appealed the Bankruptcy Court’s Order Supplementing Order Dismissing Case (FSS Case, Dkt. 1021).

**WHEREAS**, on November 11, 2024, the Connecticut Plaintiffs moved to intervene in this appeal (Dkt. 8). Neither the Trustee nor the Texas Plaintiffs have opposed the Connecticut Plaintiffs’ request to intervene as additional Appellees.<sup>2</sup>

**WHEREAS**, on December 18, 2024, the notice of the docketing of the record on appeal was filed (Dkt. 14). Pursuant to Federal Rule of Bankruptcy Procedure 8018, the Texas Plaintiffs’ current deadline to file their appellate brief is January 17, 2025.

**WHEREAS**, Federal Rule of Bankruptcy Procedure 8018 allows this Court to “specif[y] different time limits” for the filing of any brief; and

**WHEREAS**, the Parties have agreed to extend the Texas Plaintiffs’ current briefing deadline to March 3, 2025 to accommodate the ongoing efforts of the Parties to reach a settlement.

The Court, after reviewing the Parties’ request, including the advice and representations of counsel in their request, hereby **GRANTS** the extension of briefing deadlines.


IT IS HEREBY ORDERED THAT:

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<sup>2</sup> While the Court has not yet entered an order on the Connecticut Plaintiffs’ Motion to Intervene (Dkt. 8), the docket in this appeal identifies the Connecticut Plaintiffs as appellees in addition to the Trustee. Connecticut Plaintiffs together with the Trustee are identified herein as “Appellees.”

1. The Texas Plaintiffs' new deadline to file their opening brief, as Appellant, is extended by agreement to March 3, 2025.
2. Any response brief of Appellees is due on April 16, 2025.
3. The Texas Plaintiffs' reply brief, as Appellant, is due on April 30, 2025.
4. Parties' rights are reserved with respect to any additional briefing to the extent allowed under applicable law, rules and this Court's procedures.
5. The parties may stipulate to additional extensions of the briefing deadlines, subject to the Court's approval.

SO ORDERED. Dated: January 27, 2025

  
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Hon. Charles R. Eskridge  
United States District Judge

/s/ Erin E. Jones

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